

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDWARD L. WHITE, P.C.,

Plaintiff,

- against -

WEST PUBLISHING CORPORATION d/b/a “West”;
and REED ELSEVIER INC.,
d/b/a LexisNexis,

Defendants.

12-CV-1340 (JSR)
ECF CASE

**PLAINTIFF’S RESPONSE TO DEFENDANT WEST PUBLISHING
CORPORATION’S RULE 56.1 STATEMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Rule 56.1 of the Local Civil Rules of the United States District Court for the Southern District of New York, Plaintiff Edward L. White, P.C.(“Plaintiff”), by its undersigned attorneys, respectfully submits the following response as to defendant West Publishing Corporation’s (“West”) Rule 56.1 Statement.

8: Plaintiff has no dispute with the mechanical steps West takes with each document that it uploads onto its system. Plaintiff objects to the characterization of those steps as “enhancements”. Plaintiff contends that all the mechanical steps taken by West only promote West’s goal of making the documents accessible to subscribers.

13. Plaintiff has no dispute with the mechanical steps West takes with each document that it uploads onto its system. Plaintiff objects to the characterization of those steps as having “enhanced” any document. Plaintiff contends that all the mechanical steps

taken by West only promote West's goal of making the documents accessible to subscribers.

Dated: New York, New York
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